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Law Office of Bhavleen Sabharwal, P.C.

261 Madison Avenue, Suite 1063

New York, NY 10016

Email: [Bsabharwal@bsablaw.com](mailto:Bsabharwal@bsablaw.com)

(917) 597-5984

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April 22, 2025

**VIA ECF**

Honorable Robert M. Levy  
United States District Court, EDNY  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Esteban Marquez v. Indian Taj, Inc. d/b/a Santoor Indian Restaurant, et al.  
Case No.: 1:20-cv-05855-DG-RML

Dear Judge Levy:

I represent Harminster Singh in the above-referenced matter. I write to respectfully request that the Court so-order the proposed stipulation staying enforcement of the judgments against defendants pending the resolution of the motions currently before the Court.

As discussed during the last conference before the Court on March 18, 2025, there are currently pending motions to vacate default judgments before the Court, as well as ongoing proceedings regarding the appointment of a guardian ad litem for defendant Kirpal Singh. Enforcement of the judgments could cause irreparable harm to the defendants while these important matters remain unresolved.

While Plaintiff's counsel has not signed the stipulation, I provided him with notice and an opportunity to respond to the stipulation and respond to this letter to the Court and I have not yet received a response.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Bhavleen Sabharwal

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Bhavleen Sabharwal  
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261 Madison Avenue Suite 1063  
New York, NY 10016  
Tel: (917) 597-5984  
Email: [bsabharwal@bsablaw.com](mailto:bsabharwal@bsablaw.com)

cc: All counsel of record via ECF